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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
ITS OPPOSITION TO UBER'S
MOTION TO COMPEL WAYMO TO
RUN ADDITIONAL SEARCH
TERMS (DKT. 1089)**

Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff's Administrative Motion to File Under Seal Its Opposition to Uber's Motion
6 to Compel Waymo to Run Additional Search Terms (Dkt. 1089).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 11 to Waymo's Opposition	Entire Document

9
10
11
12 3. The entirety of Exhibit 11 is twelve instances of a mostly identical and highly
13 confidential email exchange among Uber employees, including technical details regarding
14 hardware and software systems of Uber's self-driving car project, such as system diagrams and
15 technical details of specific modules that relate to the operation of the self-driving car. This
16 highly confidential information is not publicly known, and its confidentiality is strictly
17 maintained. If this information were to be released to the public, Defendants' competitors and
18 counterparties would have insight into technical details regarding Uber's self-driving car project,
19 which would allow them to gain insight into how Defendants approach and solve various
20 technical challenges regarding their vehicles. Disclosure of this information could harm Uber's
21 competitive standing.

22 4. Defendants' request to seal is narrowly tailored to those portions of Plaintiff's
23 Opposition and its supporting papers that merit sealing.

24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct. Executed this 9th day of August, 2017, at Washington, D.C.

26 _____
27 /s/ Michelle Yang

28 Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: August 9, 2017

/s/ Arturo J. González
Arturo J. González